

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT
OF MISSOURI KANSAS CITY

BRANDON J. NAYLOR,)	
Plaintiff,)	
)	
)	
VS.)	Case No. 13-1208-CV-W-DGK-P
)	
)	
JEREMIE STAUCH et,al;)	
Defendants,)	

PLAINTIFFS RESPONSE TO MAY 29th,2014,ORDER

Plaintiff, BRANDON J. NAYLOR, pro se moves this honorable court for leave to Amend and /or Supplement his original complaint pursuant to federal rules of civil procedure, rule 15 for the following reasons.

1. Plaintiff BRANDON J. NAYLOR, was stopped by INDEPENDENCE,MISSOURI police on JUNE 11th 2013.Plaintiff BRANDON J.NAYLOR was released from police custody because he didn't match the description of the burglary suspect. Officer Hand asked plaintiff to return to the front of his patrol car without any probable cause. Officer Hand even states I know your not the person that did it. Soon after plaintiff was assaulted by Officer Hand and Officer Stauch the defendant's. The officers were acting UNDER COLOR OF LAW. Deliberate use of excessive force by municipal police officers effecting arrest implicates substantive due process right to be free from abuse of governmental conduct without regard to adequacy of state tort remedies. 42 U.S.C.A 1983; U.S.C.A CONST AMENDS, 5,14. MISSOURI TORT CLAIMS ACT.
2. Davidson v. Cannon, 474 U.S 344,106 S. CT. 668,88 L.Ed.2d 677 (1986)
4. Allegations of sufficiently egregious, deliberate use of excessive force by municipal police officers effecting arrest implicates substantive fourth Amendment guarantee against unreasonable seizures without regard to adequacy of state tort remedies. When I was asked to return back in front of defendant Hands patrol car I should have been read my warning of rights. I was never read my rights by any officer on the scene. 42 U.S.C.A 1983; U.S.C.A. CONST. AMEND. 4.

Daniels v. Williams, 474 U.S. 327,106 S. CT. 662,88 L.Ed.2d 662 (1986)

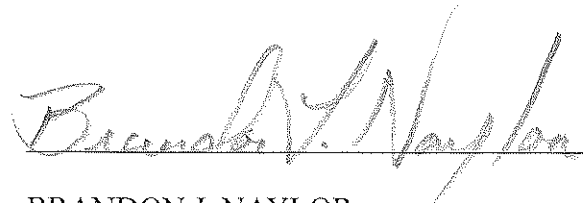
Wherefore, Plaintiff pro se BRANDON J. NAYLOR, Prays this honorable court grants this motion for LEAVE TO AMEND AND/OR SUPPLEMENT his complaint and any other relief deemed appropriate herein.

Respectfully Submitted

BRANDON J. NAYLOR

CERTIFICATE OF SERVICE

I hereby certify that on JULY 1st 2014 I sent the foregoing to the clerk of the court in the united states mail.

A handwritten signature in cursive script, reading "Brandon J. Naylor", is written over a horizontal line.

BRANDON J. NAYLOR

BRANDON RUMMEL
4300 Cherry St
K.C., MO 64116

Legal
mail

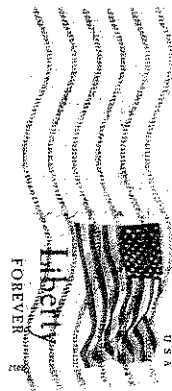
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